



COMMONWEALTH OF PENNSYLVANIA

DEPARTMENT OF HEALTH

November 13, 1970

HARRISBURG 17120

Industrial Wastes  
William Dick Lagoons  
West Caln Township, Chester County

Carl L. Mease  
Assistant Attorney General  
Office of Legal Counsel

Donald A. Lazarchik, Director  
Division of Industrial Wastes

Upon receipt of the proposal for treatment of the impounded wastes at the William Dick Lagoons, I transmitted copies of Chemical Leaman Tank Lines, Inc. proposal to the Water Quality Division, the Soils Scientist, the Regional Office and the Chester County Health Department. Comments have been received from most of these agencies.

I do not agree with some of the comments made by other agencies. The treated waste BOD of 460 mg/l does not appear excessive for spray irrigation disposal. I am much more interested in the proposed rate of application and the presence or absence of toxic materials in the wastes to be sprayed. The final disposition of the sludge can not be approved until Chemical Leaman provides data on the solubility of the sludge. If it is water soluble we will want to be assured that the land disposal site for the sludge has been properly prepared to avoid redissolving of the sludge.

We feel that the general scheme of treatment and disposal is satisfactory. We would like the company to submit some additional information before we approve the project. The following is a list of what is needed:

1. Presence or absence of toxic materials in the raw and treated waste. The proposal indicates a reduction in toxicity to fish and mice after treatment. What is causing the toxic effect? Are the toxic materials likely to damage vegetation on the proposed spray areas? A more complete analysis of the raw and treated wastes is needed.
2. Application rate for spray irrigation. How much waste will be applied, and at what rate? Exactly which parcels of land on the Dick farm will be used?
3. Solubility of sludge. Is the sludge water soluble? If so, how will the final sludge disposal site be prepared to assure minimal contact of water (ground and surface) with the sludge?

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4. Has aeration of the treated waste prior to spraying been considered? The wastes have a moderately high BOD and are supporting a large bacteria population. It is possible that simple aeration of the wastes might cause a significant reduction in BOD prior to spraying. This would provide an added safeguard in case runoff or leaching occur on the spray field.

We would be glad to meet with the Chemical Leaman people to discuss the proposal if they wish to do so.

I am returning the letters and proposal as requested in your October 20 memo.

DAL:jac

CC: Mr. Westlund  
Mr. Loughery  
Mr. Cahill ✓  
Mr. Beechwood, Norristown  
Mr. Jones, Norristown  
Div. of Ind. Wastes

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